

United States Courts  
Southern District of Texas  
FILED

SEP 09 2020

David J. Bradley, Clerk of Court

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION

UNITED STATES OF AMERICA

§

v.

§

Criminal No.

**4:20-CR-412**

IBRAHEEM AHMED AL BAYATI

§

Defendant

§

§

**INDICTMENT**

THE GRAND JURY CHARGES THAT:

**Count One**

**Threat by Interstate Communication - 18 U.S.C. § 875(c)**

On or about September 2, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the **Defendant**,

**IBRAHEEM AHMED AL BAYATI,**

did intentionally transmit in interstate commerce a threat to injure the person of another at the University of Houston in the coming days, knowing that the communication would be viewed as a threat, said threat being made during one of the university's online lectures.

In violation of Title 18, United States Code, Section 875(c).

**Count Two**

**Making Threats Or Conveying False Information To Destroy By Means of  
Fire or Explosive - 18 U.S.C. § 844(e)**

On or about September 2, 2020, in the Southern District of Texas and elsewhere within the jurisdiction of the Court, the **Defendant**,

**IBRAHEEM AHMED AL BAYATI,**

by means and use of an instrument of interstate commerce, namely, the internet, willfully made a threat, and maliciously conveyed false information knowing the same to be false, concerning an attempt being made, and to be made, to kill, injure and intimidate individuals present in, attending, and working at the University of Houston, and to damage and destroy real and personal property, to wit: the real and personal property located at the University of Houston, by means of an explosive, to wit: a bomb.

In violation of Title 18, United States Code, Section 844(e).

TRUE BILL:

**Original Signature on File**

[Redacted]  
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FOREPERSON OF THE GRAND JURY

RYAN K. PATRICK  
UNITED STATES ATTORNEY  
Southern District of Texas

Alamdar S. Hamdani

Alamdar S. Hamdani  
Assistant United States Attorney